

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

UNITED STATES OF AMERICA

v.

KELLY ANNE JENSEN

§
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§
§
§

Criminal No. 25-CR-257-03

GOVERNMENT'S UNOPPOSED MOTION TO DISMISS INDICTMENT

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States of America, hereinafter referred to as "the Government," by and through its Attorney and Assistant United States Attorney assigned to this matter and would respectfully show the Court the following:

I.

The Government respectfully requests that in the interest of justice the Indictment in the above-numbered cause be dismissed without prejudice as to Kelly Anne Jensen.

WHEREFORE, premises considered, the Government prays that this Motion to Dismiss the Indictment in all things be Granted.

Respectfully submitted,

NICHOLAS J. GANJEI
UNITED STATES ATTORNEY

/s/ James Sturgis
James Sturgis
Assistant United States Attorney

CERTIFICATE OF CONFERENCE

On May 22, 2025, I spoke with Chip Lewis and Crispin Quintanilla, attorneys for the respective defendants, and they stated that they have no opposition to the Government's motion to dismiss.

/s/ James Sturgis

James Sturgis

Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing motion was mailed, hand delivered, or e-mailed to the attorney of record, on this the 27th day of May, 2025.

/s/ James Sturgis

James Sturgis

Assistant United States Attorney

